



Sennheiser response to the RSPG consultation: Work Programme for 2024 and beyond

Sennheiser electronic GmbH & Co. KG welcomes the opportunity to provide feedback on RSPG's draft RSPG work programme for 2024 and beyond in the European Union (EU). We fully recognise the importance of the RSPG's role in advising the European Commission and in helping to map out the longer-term spectrum management strategy of the EU.

About Sennheiser

At Sennheiser, we aim to shape the future of audio by creating unique sound experiences for our customers. As a third-generation family-run business, we are equally proud of our over 75-year history and past accomplishments and innovations in the world of audio and of our ambition to shape its future.

Sennheiser electronic GmbH & Co. KG, headquartered in Wedemark (Germany), is the leading European manufacturer for professional audio solutions such as microphones, meeting solutions, streaming technologies, and monitoring systems. The business with consumer devices such as headphones, soundbars and speech-enhanced hearables is operated by Sonova Holding AG under the license of Sennheiser.

The economic importance of the Cultural and Creative Industries

The cultural and creative industries (CCI) are recognised as one of the most dynamic economic sectors, essential for cultural diversity, strengthens social cohesion and increases Europe's attractiveness internationally.¹ Studies consistently show the scale of the value of the CCIs to the EU. For example, a 2021 study by EY noted that in 2019 (before COVID-19), CCIs represented 4.4% of EU GDP in terms of turnover, with annual revenues of €643 billion and a total added value of €253 billion, employing more than 7.6 million people.²

The European Commission study on "The situation of theatres in the EU Member States" (published in 2022), highlighted that on its own the Performing Arts sub-sector had the strongest growth among all CCI sub-sectors between 2013 and 2017 of 8.6% CAGR, reaching EUR 44,7 billion in 2017.³

Wireless audio applications, such as wireless microphones, in ear monitors (IEMs) and talkback communication systems (collectively referred to as Programme Making and Special Events – PMSE) are extensively used by many cultural, creative, and societal activities, providing the tools needed for creators and performers to capture and deliver content to live audiences, film and television viewers, and attendees at social and cultural events. As such, it is important to highlight that the PMSE sector is, itself, a significant contributor to economic and cultural value within the European Union. In this context, spectrum policy for audio PMSE should be a specific area of spectrum policy development in the EU.

¹ [Data on the cultural sector | Culture and Creativity \(europa.eu\)](https://ec.europa.eu/culture/en/data-on-the-cultural-sector-culture-and-creativity)

² Rebuilding Europe – The cultural and creative economy before and after the COVID-19 crisis:
[4b2ba2_1ca8a0803d8b4ced9d2b683db60c18ae.pdf \(rebuilding-europe.eu\)](https://rebuilding-europe.eu/4b2ba2_1ca8a0803d8b4ced9d2b683db60c18ae.pdf)

³ [Study 'The situation of theatres in the EU Member States' - Publications Office of the EU \(europa.eu\)](https://ec.europa.eu/publications/en/study-the-situation-of-theatres-in-the-eu-member-states)



Review of WRC-23 results

Sennheiser supports the RSPG's view on the need to review and report on the outcome of WRC-23. This is a necessary activity in 2024, to identify the main outcomes of the WRC-23 and determine the actions needed at an EU spectrum policy level in response to those outcomes. At this stage of drafting our response the WRC-23 is still ongoing, and we therefore have no further comments at this time.

Assessment of future usage of the frequency band 470-694 MHz within the EU

The band 470 to 694 MHz band is the primary spectrum resource for audio PMSE. It is identified as a harmonised tuning range for audio PMSE equipment in ERC Recommendations 70-03 (Annex 10) and 25-10 (Annex 2) and is made available in every Member State of the EU (and more broadly in all countries of the CEPT and many countries globally). PMSE operates in the band, sharing with TV broadcasting in accordance with established sharing criteria that are well-understood and have been in effect for many decades.

Sennheiser is happy to see PMSE included in the RSPG's draft future work programme, however, we are of the view that the importance of PMSE and the economic and cultural value it delivers deserves higher prominence in the RSPG's consideration.

We recognise that in several Opinions, the RSPG has highlighted the need to address the growing spectrum needs of PMSE within in an environment where access to sufficient spectrum has declined and remains under threat. Of specific note there are RSPG15-595⁴; RSPG17-037⁵ and RSPG23-035⁶.

These Opinions all share a common view that it is important to make sufficient spectrum available for PMSE, that spectrum needs may increase in response to audience expectations for more sophisticated and larger events, and that Member States should look to identify and make available additional spectrum for audio PMSE. Despite this recognition and the recommendations by RSPG to look at opportunities for additional spectrum, no substantive work to identify such spectrum has taken place within the EU or CEPT.

In relation to the need to identify additional spectrum, the RSPG Opinions (referenced) incorrectly assert that PMSE spectrum needs are different in different countries and can be addressed at a national level. This view is incorrect.

The nature of PMSE use is similar across Member States regarding equipment and spectrum demand for events of equal size i.e. an 80 channel event in country A will have the same spectrum demand as in country B. Furthermore, most countries have large festivals, concerts, sporting, cultural and national events that generate high spectrum demand for audio PMSE, so in this context every country will experience similar spectrum requirements for PMSE.

Based on the erroneous view that PMSE spectrum requirements are different in different countries, the RSPG Opinions state that these requirements can be addressed at a national level. This view fails to recognise the benefits of harmonisation across the EU. Harmonisation can, by making spectrum available on an assured basis, promote confidence for equipment manufacturers and users to invest.

⁴ RSPG Opinion on a long-term strategy on the future use of the UHF band

⁵ RSPG Opinion on a long-term strategy on future spectrum needs and use of wireless audio and video PMSE applications

⁶ RSPG Opinion on Strategy on the future use of the frequency band 470-694 MHz beyond 2030 in the EU



It can generate economies of scale, and for the PMSE community it provides opportunities for users to use their equipment throughout the EU, which is of particular importance to those events that operate across different countries or have international appeal. By indicating that PMSE spectrum access can be dealt with at a national level, the RSPG risks promoting fragmentation of the market and undermining the benefits of that harmonisation brings for the EU single market.

Conclusion

Given the well documented and recognised economic and social value that the CCI's deliver across the EU and nationally, and the role that PMSE plays as a corner stone of that value, the spectrum requirements of PMSE should be identified as a separate and distinct activity within the RSPG's future work programme. This work should be original and innovative and not simply repeat long-held views that have been refuted.

Further, given the lack of any meaningful action by the EU or Member States in response to previous RSPG Opinions regarding PMSE, the outcome of this new work item should look to identify specific actions to be taken by the Commission.

We therefore propose that a new item is added to the RSPG's proposed work programme for 2024 and beyond, specifically related to addressing spectrum access for audio and video PMSE that looks to identify harmonised spectrum and spectrum access arrangements that reflect the importance of the PMSE sector that supports and helps deliver the incredible value of the Creative and Cultural Industries.